SAIPAN OFFICE

Second Floor, Nauru Building P.O. Box 501969 Saipan, MP 96950-1969 Telephone: (670) 234-5684/5 Fax: (670) 234-5683 E-mail: attorneys@saipan.com

HONOLULU OFFICE

Suite 2800, Pacific Tower Bishop Square, 1001 Bishop Street Honolulu, Hawaii 96813-3580 Telephone: (808) 585-8858 Fax: (808) 599-4198 E-mail: mark@shklovlaw.com

O'CONNOR BERMAN DOTTS & BANES ATTORNEYS AT LAW

SAIPAN OFFICE www.pacific-lawyers.com

July 7, 2006



GUAM OFFICE

Suite 503, Bank of Guam Bldg. 111 Chalan Santo Papa Hagáña, Guam 96910 Telephone: (671) 477-2778 Fax: (671) 477-4366 E-mail: bermlaw@kuentos.guam.net

POHNPEI OFFICE

Second Floor, Ace Commercial Building P.O. Box 1491, Kolonia, Pohnpei, Federated States of Micronesia, 96941 Telephone: (691) 320-2868 Fax: (691) 320-5450 E-mail: bermlaw@mail.fin

Delivered by Telecopy

Heather Kennedy, Esq. PSS Legal Counsel/EEO Officer P.O. Box 501370 Saipan, MP 96950 Fax: 664-3798

Re: Lisa Black v. PSS, et al.

Dear Heather:

I would like to take another opportunity to resolve the issue that has arisen with regard to your client's responses to my client's Second Set of Requests For Production. As I explained in my June 27, 2006 letter, PSS's responses did not specifically identify documents for the various requests. It is clear that when confronted with a "contention" request for production that merely stating that the document has already been produced is insufficient.

Can I expect an amended response that will include the Bates-stamp numbers that identify specific responsive documents? While I would like to work this out amongst ourselves, I am mindful that the deadline for filing discovery motions is approaching. Again, I would like you to consider this a final attempt to meet and confer in good faith without involving the Court.

Thanks and please feel free to give me a call if you think that we can work this out.

Manuella

Very truly yours

George L. Hasselback, Esq.

Cc. Ben Demoux.

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LAW OFFICES OF O'CONNOR BERMAN DOTTS & BANES

ATTORNEYS AT LAW

Second Floor, Nauru Building P.O. Box 501969, Saipan, MP 96950-1969 Telephone No. (670) 234-5684/5 · Fax No. (670) 234-5683 E-mail: attorneys@saipan.com

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Heather Kennedy, Esq.

664-3713

Benjamin DeMoux, Esq.

664-2349

From:

George L. Hasselback, Esq.

Client/Matter: 3221-01/Lisa Black

Date:

June 19, 2006

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Case 1:05-cv-00038

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Second Floor, Nauru Building P.O. Box 501969, Saipan, MP 96950-1969 Telephone No. (670) 234-5684/5 · Fax No. (670) 234-5683 E-mail: attorneys@saipan.com

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